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File Number=**0002831787**Matches **1**- **1** (of **1**)

= Open Petition For Reconsideration (PFR) Status

TP = Termination Pending or Terminated

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File Number	Call Sign/Lease ID	Applicant Name	FRN	Purpose	Radio Service	Receipt Date	Status
1 0002831787	WPZK450	Ronan Telephone Company	0001643006	Request for Extension of Time	WZ	11/29/2006	Pending

File Number	Call Sign/Lease ID	Applicant Name	FRN	Purpose	Radio Service	Receipt Date	Status
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File Number	0002831787	Radio Service	WZ - 700 MHz Lower Band
Call Sign	WPZK450	Application Status	2 - Pending

General Information

Application Purpose EX - Request for Extension of Time

Existing Radio Service

Authorization Type

Emergency STA

Receipt Date 11/29/2006

Action Date 11/30/2006

Entered Date 11/29/2006

Requested Expiration Date

Waiver

Number of Rules

Attachments Yes

Grandfathered Privileges

Application Fee Exempt No

Regulatory Fee Exempt

Major Request

Market Data

Market -

Channel Block

Submarket Designator

Associated Frequencies (MHz)

Applicant Information

FRN 0001643006
 (View Ownership Filing)
 Name Ronan Telephone Company
 312 Main Street SW

Type Corporation
 P:(406)676-9217
 F:(406)676-2737

Ronan, MT 59864
ATTN Jay Preston

E:jaywp@ronan.net

Real Party in
Interest

FRN of Real
Party in
Interest

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MAIN **ADMIN** **TRANS LOG** **EXTENSION**

File Number 0002831787 Radio Service WZ - 700 MHz Lower Band
Call Sign WPZK450 Application Status 2 - Pending

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Attachments

Type	Description	Date Entered
Waiver	EXHIBIT D MAP	11/29/2006
Waiver	MOTION FOR BUILDOUT TIME	11/29/2006
Waiver	EXHIBIT C	11/29/2006
Waiver	RESOLUTION	11/29/2006
Waiver	EXHIBIT A	11/29/2006

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**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

IN THE MATTER OF

the Motion of the Blackfeet Tribal
Business Council and Ronan Telephone
Company for Extension of the
Build-out Time Requirement for a
Portion of the Lower 700 MHz Wireless

Docket No. 06-231

WAIVER - EXPEDITED ACTION

License Montana RSA 1 - Lincoln
(CMA 523) Consisting of the
Blackfeet Indian Reservation, Montana

REQUESTED

To: The Commission

**BLACKFEET TRIBAL BUSINESS COUNCIL
AND RONAN TELEPHONE COMPANY
MOTION FOR EXTENSION OF BUILD-OUT REQUIREMENT
FOR 700 MHZ LICENSE**

The Blackfeet Tribal Business Council and Ronan Telephone Company (hereinafter, BTBC and RTC, or "Movants") hereby respectfully move the Federal Communications Commission (FCC), and request an Order approving an extension of the time required for build-out of a portion of the 700 MHz License area- Montana RSA 1 (CMA 523), located on the Blackfeet Indian Reservation, Montana. FCC Form 601 accompanies this Motion. This Motion is based upon 47 C.F.R. §1.946(e) and the FCC's Third Report and Order.¹

The Blackfeet Tribal Business Council (BTBC) is the governing body of the

¹ In the Matter of Extending Wireless Telecommunications Services to Tribal Lands, WT Docket No. 99-266, *Third Report and Order*, 19 FCC Rcd 17652 (Released: September 2, 2004).

Blackfeet Nation on the Blackfeet Indian Reservation, Montana. Siyeh Development Corporation (Siyeh) is a federally chartered Corporation that is 100% tribally owned by the Blackfeet Tribe and controlled by the BTBC. Siyeh operates various tribal businesses on the Blackfeet Reservation.

Ronan Telephone Company (RTC) is a local exchange carrier in Ronan, Montana (located on the Flathead Indian Reservation). RTC is a privately owned Montana Corporation that is not affiliated with any Tribe or Tribal entity. RTC was the winning bidder in the FCC Lower 700 MHz C Block Spectrum Auction (FCC Spectrum Auction No. 44) for the Montana RSA 1 - Lincoln (CMA 523) license area.² This license area encompasses northwestern portions of the state of Montana, including the following counties: Lincoln, Sanders, Lake, Flathead, Glacier, Pondera, and Teton; the Blackfeet Indian Reservation lies within Montana RSA 1 - Lincoln.

After lengthy negotiations between RTC, the Blackfeet Tribal Business Council and Siyeh, the BTBC, by Resolution dated December 16, 2002,³ certified RTC as eligible to receive the tribal lands bidding credit pursuant to 47 C.F.R. §1.2110(e)(3), for purposes of FCC Spectrum Auction No. 44. RTC was the winning bidder and received the tribal lands bidding credit in Auction No. 44, for License area Montana RSA 1. As consideration for this Certification by the

² Grant Date, January 29, 2004, Effective Date, March 26, 2004. A copy of the License is attached hereto as Exhibit A.

³ A copy of the Blackfeet Resolution and Certification, dated December 16, 2002, are attached hereto as Exhibit B and Exhibit C.

Blackfeet Nation, RTC agreed to partition and transfer ownership of the portion of the License area authorizing service on the Blackfeet Indian Reservation,⁴ to the BTBC, so that the BTBC and Siyeh could develop and operate

⁴ A map of the Blackfeet Indian Reservation is attached hereto as Exhibit D.

a telecommunications business on the Reservation, utilizing the Lower 700 MHz C Block License.⁵

RTC and BTBC will therefore also soon be filing a Motion with the FCC requesting partitioning and partial assignment of Montana RSA 1 (CMA 523), to transfer ownership of the portion of the License authorizing service on the Blackfeet Indian Reservation to the BTBC. In addition, Siyeh and RTC have formed a new Montana Limited Liability Company, named "Oki Communications, LLC" for purposes of constructing and operating this new telecommunications business on the Blackfeet Reservation as a Limited Liability Company partnership, utilizing the Lower 700 MHz C Block License.

FCC rules contain specific build-out time requirements on tribal lands to fulfill the obligations of the tribal lands bidding credit program. In particular, 47 C.F.R. §1.2110 provides that with respect to recipients of tribal lands bidding credits, a Certification must be filed within three years after the initial grant of the License, stating that the licensee has "constructed and is operating a system capable of serving seventy-five (75) percent of the population of the qualifying tribal land for which the credit was awarded." 47 C.F.R. §1.2110(f)(3)(vi). If this build-out requirement is not satisfied, the licensee is required to repay the entire bidding credit, plus interest; 47 C.F.R. §1.2110(f)(3)(vii). The License herein was granted on January 29, 2004. Therefore, absent an extension, the applicable build-out deadline on the Blackfeet Indian Reservation in Montana RSA 1, is January 29, 2007.

Waiver of an FCC Rule is appropriate "if the underlying purpose of the rule

⁵ Section 27.15 of the FCC Rules permit a licensee of a 700 MHz License to partition its geographic service area; 47 C.F.R. §27.15.

would not be served," or if application of the rule would be inequitable, unduly burdensome or contrary to the public interest; 47 C.F.R. §1.925(3). More generally, FCC Rules may be waived for "good cause"; 47 C.F.R. §1.3. With respect to wireless licensing, the FCC Rules and applicable Orders allow extensions of the build-out deadline to accommodate construction difficulties and extenuating circumstances.

(e) Requests for extension of time. Licenses may request to extend a construction period or coverage period by filing FCC Form 601. The

request must be filed before the expiration of the construction or coverage period.

(1) An extension request may be granted if the licensee shows that failure to meet the construction or coverage deadline is due to involuntary loss of site or other causes beyond its control. 47 C.F.R. §1.946(e)

FCC Orders have further discussed the grounds which can justify an extension of the build-out requirements.

For example, there may be conditions, such as technical obstacles, economic factors, or other difficulties that may make it difficult for carriers to satisfy the stricter construction requirement.

Circumstances may exist on remote tribal lands such as low population density, rough terrain, or other factors that can negatively effect the ability of carriers to provide the requisite coverage to facilities in those areas.

Second Report and Order, 18 FCC Rcd 4775, at ¶22 (2003)⁶

In particular, the record, though limited, suggests that underutilization of the tribal lands bidding credit program stems from technical obstacles, economic factors, difficulties obtaining certifications, and other problems, . . . In addition, we note that tribal lands may vary significantly with regard to population density, terrain and other such buildout factors which can affect the feasibility of building out facilities on tribal lands and account for the lack of service. We note, too, that should a carrier be unable to fulfill its construction requirements at the end of three years, it may seek a waiver from the relevant Commission rule.

Third Report and Order, 19 FCC Rcd 17652, at ¶8 (2004)⁷

⁶ In the Matter of Extending Wireless Telecommunications Services to Tribal Lands, WT Docket No. 99-266, *Second Report and Order and Second Further Notice of Proposed Rulemaking*, 18 FCC Rcd 4775 (March 14, 2003).

The FCC has therefore recognized that a variety of special factors and extenuating conditions on tribal lands can affect the ability to build out a license area within the three year time frame, and that waivers are appropriate to accommodate these difficulties.

⁷ In the Matter of Extending Wireless Telecommunications Services to Tribal Lands, WT Docket No. 99-266, *Third Report and Order*, 19 FCC Rcd 17652 (September 2, 2004).

Based on the above cited Rule and Orders, the BTBC and RTC jointly request an extension of the build-out requirement on the Blackfeet Indian Reservation, pursuant to Rule 1.946(e), for the reasons described below:

The presence of a UHF television station in the area interferes with the ability of Oki Communications LLC to fully utilize the 700 MHz "C" Block spectrum on the Blackfeet Indian Reservation. Specifically, the television station precludes Oki from using one of more high altitude transmitter sites that would be capable of serving 75% of the population on the Blackfeet Reservation. A UHF television transmitter, K54AM, located 25 miles northwest of Joplin, Montana and 88 miles northeast of Browning, Montana⁸ transmits on UHF channel 54 (the Lower 700 MHz C Block consists of UHF Channels 54 and 59). This television transmitter transmits a TV signal at 11.7 KW over the Blackfeet Reservation and interferes with the received signal from multiple customer locations to any 700 MHz wireless cell site transmitter/receiver that Oki Communications could utilize from either of two most desirable high elevation mountain top sites to serve a large geographic area of the Reservation pursuant to License Montana RSA 1.⁹ FCC rules require Movants to avoid interference with the existing co-channel and adjacent channel UHF Stations. In particular, there is a minimum desirable signal to undesirable signal ratio limit (D/U) of 40 dB; See, 47 C.F.R. §27.60. The presence of the Channel 54 co-channel signal makes it impossible to provide wireless telecommunications services utilizing the same frequency band of 710-716 MHz

⁸ Browning is the seat of government and largest town on the Blackfeet Indian Reservation.

⁹ The two mountain top sites are: 1. Divide Mountain, which is 103 miles west of the K54AM transmitter; and, 2. Baldy Mountain, which is 98 miles southwest of the K54AM transmitter. Both of these sites have a clear line of sight to the K54AM transmitter, allowing the interference that makes these two sites unusable for Oki Communications broadband data systems as long as K54AM transmits on Channel 54.

716 MHz back to the mountain top sites allowing coverage of 75% of the Reservation population from one or two transmitters. The multi-point customer location transmitters of the system Oki has chosen to use transmit from the customer location back to the central transmitter/receiver cell site on a subchannel within channel 54. Consequently, a high altitude cell site would simultaneously receive the television signal from K54AM and the signal from the multiple customer transmitter locations (which are transmitting at less than 1 watt of power, compared to the TV transmitters much higher power of 11,700 watts). In this case, the TV signal from K54AM interferes with the data system's ability to coherently receive the signal from the multi-point customer CPE transmitters at the potential mountain top cell sites, thus making the system unable to function with cell sites on these locations. This difficulty has caused Oki Communications to seek low elevation transmitter site alternatives that are geographically shielded from the interference of K54AM. The town of Browning, Montana is the headquarters of the Blackfeet Nation and the largest community by far on the Reservation. The Browning townsite is shielded from the signal of K54AM by a low set of hills east of Browning, directly between the town and the transmitter of K54AM. Oki Communications has determined that a cell site located on a water tower in the center of the Browning townsite can successfully receive the signals from multiple subscriber locations in and around the Browning townsite, in the presence of the diminished signal from K54AM, without interfering with the operation of the broadband data system. K54AM will not be affected, since the low hills east of Browning make that station too weak to receive -- an unusable signal in Browning. The transmitted signals from these multiple customer sites (transmitting at less than 1 Watt) far exceeds the minimum 40 dB D/U ratio with K54AM at the required service area contour as required in 47 C.F.R. §27.60. Oki

Communications has now constructed a transmitter cell site that will serve the townsite of Browning and the immediately

surrounding area, and that service is planned to be available to the public beginning November 20, 2006.¹⁰

Approximately one half of the population of the Blackfeet Indian Reservation is concentrated in the community of Browning and the remainder are widely scattered over 2,344 square miles of reservation land. According to the 2000 U.S. Census, the Browning area has a population of 5,050, compared to the total population of the Reservation of 10,100. The Browning census tract encompasses an area roughly equivalent to the area served by the broadband data transmitter currently being installed by Oki. Thus, the cell site transmitter installation that will serve the Browning area will cover approximately one-half of the total Reservation population. As noted earlier, the presence of K54AM precludes high elevation transmitter cell sites that would facilitate serving a large geographic area on the Blackfeet Reservation and consequently meet the 75% population coverage requirement.

¹⁰ The received signal of the newly installed Browning, Montana cell site (to be transmitted at low power from multiple customer premise transmitter locations) is offset 0.65 MHz from the video carrier of K54AM. Please note that K54AM partially interferes with the spectrum allowed for the 710 - 716 Mhz portion of the Lower 700 MHz C Block license, in that the presence of the K54AM video and audio carriers limits the spectrum available in the 6 MHz wide channel 54 to approximately a 3.5 MHz wide band.

There are several other low elevation transmitter locations that could serve other much smaller communities on the Reservation, including East Glacier Park, Heart Butte, and the St. Mary river valley downstream from Glacier National Park. It has been determined that three additional low elevation cell site transmitters would be capable of serving these areas, without experiencing interference from K54AM. In addition, several obstacles preclude the ability of Oki Communications to construct and operate these three possible transmitters prior to the current build-out deadline (January 29, 2007), including current and not unexpected financial constraints of the start-up venture, Oki Communications, and the lack of an integrated data transport infrastructure between Browning and the three communities listed.¹¹ Oki Communications is now concentrating its efforts to providing service to Browning, and will, after that service is successfully launched, begin planning for the financing and construction of additional transmitters and transport facilities to serve East Glacier Park and Heart Butte. The St. Mary area will be addressed after East Glacier Park and Heart Butte are served.

In summary, the BTBC, Siyeh, and RTC have put forward significant good faith efforts, including the formation of jointly owned Oki Communications, LLC, and the construction of a system to serve the largest community on the

¹¹ The communities of Browning and Heart Butte are served for wireline voice service out of the Browning exchange owned and operated by the incumbent LEC, 3 Rivers Telephone Cooperative; whereas the communities of East Glacier Park and St. Mary are served for wireline voice service by the incumbent LEC RBOC Qwest. It is Movants' understanding that the existing infrastructure between Heart Butte and Browning is incapable of providing broadband transport between these two locations. In addition, it is also Movants' understanding that affordable broadband transport does not exist between the facilities of 3 Rivers (serving Browning) and Qwest (serving East Glacier Park and St. Mary). The combination of these two circumstances make data transport between Browning and the outlying smaller communities on the Blackfeet Reservation extremely expensive and/or unavailable for broadband data, using the existing incumbent infrastructure. This combination of circumstances precludes Movant's ability to connect data cell locations in these outlying communities to the network Movants' are constructing in Browning.

Reservation (comprising 50% of the Reservation population) within the three year limit. The presence of UHF channel 54 creates a technical obstacle beyond the control of BTBC, Siyeh and RTC to meet the 75% coverage requirement; and therefore justifies a waiver under FCC Rule 1.946(e)(1) and other FCC Rules. Granting the requested extension of three years will facilitate Oki's ability to extend its services to the above mentioned outlying communities and therefore work toward fulfilling the requirement that 75% of the reservation population have access to the wireless broadband data service.

The goal of the Oki Communications, LLC venture is to establish a business entity, majority-owned by the Blackfeet Tribe, to provide wireless broadband data service using the Lower 700 MHz C Block license on the Reservation. RTC, which originally purchased the 700 MHz License, has committed to provide 49% of the capital, and has provided telecommunications expertise, consulting, as well as other support services, as the minority owner of the LLC. The process of conceiving, forming and organizing a jointly owned Limited Liability Company, between tribal and non-tribal entities was a unique concept that evolved into a time consuming task and involved a great deal of original thought and joint effort of the parties. As a result, the jointly owned entity, Oki Communications, LLC, was only formed earlier this year. The very limited availability of funding from tribal sources and two unsuccessful attempts to secure grant funding over the three year period has also slowed progress on the project.

Broader technical and market problems continue to exist which have hampered construction, delayed progress, and kept costs high. The delay at the federal level in implementing the digital TV transition has delayed robust development of wireless data systems in the 700 MHz spectrum by national and international wireless data system vendors. The number of vendors who have

made systems available in this spectrum remains very limited. The presence of UHF TV stations nationally (particularly in major metropolitan areas) that interfere with this spectrum, and the continued uncertainty of when the DTV transition will proceed and thus enable the eventual clearance of this spectrum, has precluded the development of services in urban markets using this spectrum. The combination of all these factors has consequently impeded robust development of cost effective equipment and systems for this band.

The system Oki Communications has selected to utilize is compatible with the Cable TV broadband data standards (DOCSIS) – this system was chosen because Siyeh operates the CATV system in Browning and East Glacier Park. This broadband wireless system has not been deployed in any mass markets because of the delays in the previously described digital TV transition and the consequent continued interference from existing UHF TV stations nationally; this ongoing problem continues to make the construction of such a system quite expensive. The high cost that results from the relatively small volume of sales for systems currently available in the 700 MHz spectrum further impedes Oki Communications' ability to quickly serve multiple communities at an affordable cost. The business plan for Oki Communications indicates that the total cost of constructing and operating Oki to positive cash flow in the community of Browning alone will consume approximately \$400,000 in capital. The BTBC and RTC's parent company (CommunityTel, Inc.) have jointly expressed a commitment to this amount of capital in the effort to launch the service in Browning. Both plan to participate in the process of raising the additional capital needed to serve East Glacier Park and Heart Butte once the service is launched in Browning. The success of the service in Browning will largely determine the ability of Oki to expand into these other smaller communities.

Under the circumstances described above, the Movants request an three year extension of the build-out requirements on the Blackfeet Indian Reservation.

The unique and unavoidable circumstances present, most significantly, the unavoidable interference from UHF television channel K54AM, are beyond Movants' control. These circum-stances make it impossible to provide useable service to 75% of the population of the Reservation at the present time. Movants must comply with the FCC rules regarding interference with existing UHF stations, and will not build systems that would be rendered inoperable by interference from this existing UHF TV station. Under current proposals, UHF stations do not have to vacate the existing 700 MHz frequency spectrum until February of 2009.¹² Movants have used their best diligent efforts during the preceding three years, to overcome the business, governmental, legal, financial and technical obstacles involved in bringing reliable 700 MHz wireless broadband data service to the Blackfeet Reservation. However, all of these efforts have expended substantial time and resources of the parties. Tremendous progress has been made, but more time is needed to successfully complete this project, with the ultimate goal of establishing an economically sound tribally controlled entity, Oki Communications, LLC,

¹² Deficit Reduction Act of 2005, Pub. L. 109-171, 120 Stat. 4 (2006) (DTV Act).

providing the Blackfeet Reservation with high-quality reliable wireless telecommunications services.

Movants respectfully request that they not be penalized for the extra time which has been necessary to plan and develop an entirely new tribal/private partnership concept and the resulting business enterprise, in the face of business and technical problems on the Reservation. The presence of UHF TV station K54AM is beyond Movants' control. In addition, the national regulatory and market uncertainties that affect the new use of the 700 MHz spectrum is similarly beyond Movants' control. Failure to grant an extension would penalize the Blackfeet Indian Tribe, one of the very entities which both Federal treaty obligations and FCC Indian Telecommunications Initiative policies are designed to assist. Such an unwarranted penalty would occur in the midst of the BTBC's efforts to create a unique tribal/private partnership that creatively enables the partnership enterprise while honoring the underlying principle of tribal sovereignty. FCC policy strongly supports the goals of this project. First, the promotion of Tribal sovereignty, businesses and economies. Second, the provision of wireless broadband data service in sparsely populated rural areas. And third, the promotion of increased telecommunications competition in a tribal community whose telecommunications' market is dominated by a single ILEC cooperative.¹³

cooperative.¹³ The FCC stated, in its initial 2000 Report and Order on extending service to tribal lands:

[w]e are willing to consider relaxing our buildout requirements in cases where parties can demonstrate that doing so will expedite deployment of service to tribal lands. We therefore encourage parties to file specific waiver requests if need be, and commit to consider such requests expeditiously. In the Matter of Extending Wireless Telecommunications Services to Tribal Lands, *Report and Order and Further Notice of Proposed Rulemaking*, WT Docket No. 99-266, 15 FCC Rcd 11794, 11809, ¶41 (2000).

Denial of the waiver request will severely impede RTC's ability to continue to invest in Oki Communications, effectively starving the enterprise of badly needed capital just as it starts. Granting the waiver requested herein would promote all of these FCC policies, expedite the provision of this sorely needed competitive service on the Blackfeet Reservation, and most importantly, enable the successful launch of an independent tribally controlled business entity that will enhance the Blackfeet Tribes' sovereignty and economic well being.

WHEREFORE, based upon the foregoing, BTBC and RTC respectfully request an extension of the build-out requirement for the tribal lands of 700 MHz License area Montana RSA 1 - Lincoln (CMA 523), specifically, within the Blackfeet Indian Reservation. RTC and BTBC request a three (3) year extension

¹³ See e.g., In the Matter of Trustee in Bankruptcy for Magnacom Wireless, LLC and Telecom Wrap Up Group, LLC; Petition for Waiver of Extension of Broadband PCS Construction Requirements, *Order*, 17 FCC Rcd 9535, at ¶¶6-8 (2002) (granting extension of buildout requirement on tribal lands), *citing*, In the Matter of Extending Wireless Telecommunications Services to Tribal Lands, *Report and Order*, 15 FCC Rcd 11794 (2000) (promoting wireless telecommunications services on tribal lands is consistent with the FCC's objectives under the Telecommunications Act); See, 15 FCC Rcd at 11801-11802, ¶¶18-20.

of the requirement, to allow additional time to address and resolve the interference and technical obstacles to completion of the system. Accordingly, the parties request a waiver of 47 C.F.R. §1.2110(f)(3)(vi).

Note that the applicable FCC Rule provides that when an extension request is based on "involuntary loss of site or other circumstances beyond the licensee's control," the construction period is "automatically extended pending disposition of the extension request." 47 C.F.R. §1.946(4). This Motion is based upon circumstances beyond the licensee's control, and therefore, pursuant to this Rule, the construction period will be automatically extended upon the filing of this Motion, until disposition by the FCC. However, Movants respectfully request action on this Motion by the FCC as soon as

possible, to provide certainty to the parties.

DATED: November 29, 2006

Respectfully Submitted,

/s/ Terryl T. Matt
Terryl T. Matt
Attorney for the Blackfeet Tribal Business Council

/s/ Ivan C. Evilsizer
Ivan C. Evilsizer
Attorney for Ronan Telephone Company

Federal Communications Commission
Wireless Telecommunications Bureau
Radio Station Authorization

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LICENSEE NAME: Ronan Telephone Company

JAY PRESTON
 RONAN TELEPHONE COMPANY
 312 MAIN STREET SW
 RONAN MT 59864

FCC Registration Number (FRN)	
0001643006	
Call Sign	File Number
WPZK450	
Radio Service	
WZ - 700 MHz Lower Band	

Grant Date	Effective Date	Expiration Date	Print Date
01-29-2004	03-26-2004	01-01-2015	09-01-2004

Market Number	Channel Block	Sub-Market Designator
CHAS23	0	0

Market Name: Montana 1 - Lincoln

1st Build-out Date	2nd Build-out Date	3rd Build-out Date	4th Build-out Date
01-01-2015			

SPECIAL CONDITIONS OR WAIVERS/CONDITIONS

If the facilities authorized herein are used to provide broadcast operations on or before January 1, 2008, the licensee is required to seek renewal of this license at the end of the eight-year term following commencement of such broadcast operations. Operation of the facilities authorized herein, are subject to the condition that harmful interference may not be caused to, but must be accepted from UHF TV transmitters in Canada and Mexico as identified in existing and any future agreements with those countries.

("Special Conditions or Waivers/Conditions" continued on next page...)

The licensee hereof is authorized for the period indicated, to operate a radio transmitting station in accordance with the terms and conditions hereinafter described. This authorization is subject to the provisions of the Communications Act of 1934, as amended, subsequent Acts of Congress, International treaties and agreements to which the United States is a signatory, and all pertinent rules and regulations of the Federal Communications Commission, contained in Title 47 of the Code of Federal Regulations.

Conditions:

Pursuant to Section 309(h) of the Communications Act of 1934, as amended, 47 U.S.C. Section 309(h), this license is subject to the following conditions: This license shall not vest in the licensee any right to operate the station nor any right in the use of the frequencies designated in the license beyond the term thereof nor in any other manner than authorized herein. Neither the license nor the right granted thereunder shall be assigned or otherwise transferred in violation of the Communications Act of 1934, as amended. See 47 U.S.C. Section 310(d). This license is subject in terms to the right of use or control conferred by Section 706 of the Communications Act of 1934, as amended. See 47 U.S.C. Section 606.

A graphical representation of the geographic area authorized to this call sign may be generated by selecting Search 'Licenses' at the following web address: <http://wireless.fcc.gov/uls/index.html>.

License - EXHIBIT A

FCC 601 - MB
 January 2004

Licensee Name: Ronan Telephone Company

Call Sign
WPZK450

File Number

Print Date
09-01-2004

Special Conditions or Waivers/Conditions

A tribal lands bidding credit has been awarded for this authorization. The licensee is required to construct and operate a system capable of serving seventy five percent of the population of each qualifying land for which the credit was awarded by 01-25-2

007. The licensee must file a

notification within 15 days of 01-29-2007 stating that it has satisfied the construction requirement. If the licensee was awarded a higher bidding credit via a waiver, the licensee must also file a certification that the cred

it amount was spent on infrastructure to provide wireless

coverage to qualifying tribal lands. This certification must include a report prepared by an independent auditor verifying that the infrastructure costs are reasonable to comply with the Commission

's requirements. In the event the licensee fails to satisfy the construction or notification requirement(s), it shall repay the bidding credit in its entirety, plus interest, 30 days after the conclusion of the buildout period. Failure to repay this amount will result in

automatic cancellation of the licensee's license.

License - EXHIBIT A

FCC 601 - MB



BLACKFEET NATION

P.O. BOX 850 BROWNING, MONTANA 59417
(406) 338-7521 FAX (406) 338-7530

EXECUTIVE COMMITTEE

WILLIAM "ALLEN" TALKS ABOUT - CHAIRMAN
JIMMY ST. GODDARD - VICE CHAIRMAN
GORDON MONROE - SECRETARY
CLIFFORD TAILFEATHERS - ACTING SECRETARY
JOE A. GERVAIS - TREASURER

BLACKFEET TRIBAL BUSINESS COUNCIL

WILLIAM "ALLEN" TALKS ABOUT
JIMMY ST. GODDARD
GORDON MONROE
CLIFFORD TAILFEATHERS
FRED GUARDIPEE
EARL OLD PERSON
JAY ST. GODDARD
ERVIN C. CARLSON
HUGH MONROE

RESOLUTION

NO: 86-2003

WHEREAS, The Blackfeet Tribal Business Council is the duly constituted governing body within the exterior boundaries of the Blackfeet Indian Reservation, and

WHEREAS, The Blackfeet Tribal Business Council has been organized to represent, develop, protect and advance the views, interests, education and resources of the Blackfeet Indian Reservation, and


WHEREAS, Ronan Telephone Company, a Montana Corporation (RTC) was the winning bidder in the FCC 700 MHZ spectrum auction (FCC Spectrum Auction 44) for the Montana-1 Lincoln RSA #523; and has agreed to partition the license for the license area serving the Blackfeet Indian Reservation; and transfer ownership of the portion of the license serving the Reservation, to the Blackfeet Tribal Business Council (BTBC) pursuant to the agreement between the parties dated December 16, 2002, and

WHEREAS, the Blackfeet Nation hereby intends to Certify RTC as eligible to receive the Tribal lands bidding credit provided in 47 C.F.R. Sec. 1.2110(e)(3), for purposes of receiving the credit in the FCC Spectrum Auction 44, for the Montana-1 Lincoln RSA #523 license area, and

NOW, THEREFORE BE IT RESOLVED, based upon the foregoing and the Agreement between the parties dated December 16, 2002, the BTBC hereby Certifies RTC, pursuant to 47 C.F.R. Sec. 1.2110(e)(3), to receive the tribal lands bidding credit.

ATTEST:

THE BLACKFEET TRIBE OF THE
BLACKFEET INDIAN RESERVATION


GORDON MONROE
Secretary

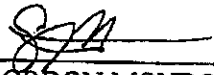

WILLIAM A. TALKS ABOUT
Chairman

Resolution - EXHIBIT B

CERTIFICATION

I hereby certify that the foregoing Resolution was adopted by the Blackfeet Tribal Business Council in a duly called, noticed, and convened Special Session, assembled the 16th day of December, 2002 with Seven members present to constitute a quorum, and with a vote of 7 FOR and 0 OPPOSED.

(SEAL)


GORDON MONROE
Secretary

Resolution - EXHIBIT B

CERTIFICATION
By the Blackfeet Tribal Business Council,
to
Ronan Telephone Company, a Montana Corporation

Re: FCC Spectrum Auction 44; Montana Lincoln Rural Service Area (RSA) #523 (WZ-CMA523-C), Tribal Lands Bidding Credit

December 16, 2002

WHEREAS, Ronan Telephone Company, a Montana Corporation (RTC) was the winning bidder in the FCC 700 MHZ spectrum auction (FCC Spectrum Auction 44) for the Montana-1 Lincoln RSA #523; and RTC has agreed to partition the license for the license area serving the Blackfeet Indian Reservation; and transfer ownership of the portion of the license serving the Reservation, to ownership by the Blackfeet Tribal Business Council (BTBC) pursuant to the agreement between the parties dated December 16, 2002.

WHEREAS, BTBC and Siyeh Development, Inc., the business subsidiary corporation of the Blackfeet Nation (Siyeh), desire to enter into an agreement with RTC, to enable the BTBC and Siyeh to provide wireless telecommunications services to the Blackfeet Indian Reservation by means of 700 MHZ radio spectrum, and a basic agreement has been entered into between the BTBC, Siyeh and RTC for this purpose dated December 16, 2002; and

WHEREAS, the Blackfeet Nation hereby intends to Certify RTC as eligible to receive the Tribal lands bidding credit provided in 47 C.F.R. Sec. 1.2110(e)(3), for purposes of receiving the credit in the FCC Spectrum Auction 44, for the Montana-1 Lincoln RSA #523 license area; and,

WHEREAS, based upon the foregoing and the Agreement between the parties dated December 16, 2002, the BTBC hereby Certifies RTC, pursuant to 47 C.F.R. Sec. 1.2110(e)(3), as follows:

1. The Blackfeet Indian Reservation, which is located within the boundaries of the Montana-1 Lincoln RSA #523 (WZ-CMA523-C) of the FCC Spectrum Auction 44, constitutes "qualifying tribal land" as defined in 47 C.F.R. Sec. 1.2110(e)(3)(I). The Blackfeet Indian

Reservation is a federally recognized Indian Reservation; and the wireline telephone subscription rate on the Reservation is equal to or less than seventy (70) percent based on the FCC analysis of the most recently available U.S. Census Data (according to the FCC, as published on the FCC website, the wireline subscription rate is 68%);¹

2. The BTBC hereby authorizes RTC and Siyeh, based upon RTC being the winning bidder in FCC Spectrum Auction 44 for the Montana-1 Lincoln RSA #523 (WZ-CMA-523-C), to site facilities and provide service on its tribal land, the Blackfeet Indian Reservation.

3. The tribal area to be served constitutes qualifying tribal land, as defined in 47 C.F.R. Sec. 1.2110(e)(3)(I).

4. The BTBC covenants and agrees that it has not and will not enter into an exclusive contract with RTC precluding entry by other carriers, and will not unreasonably discriminate among wireless carriers seeking to provide service on qualifying tribal land.

5. RTC has represented that it will consult with the BTBC and Siyeh regarding the siting of facilities and deployment of telecommunications services on the Blackfeet Reservation. Upon partition of the Blackfeet Reservation lands portion of the license and transfer of ownership of the said portion of the license from RTC to the BTBC, the responsibility for the siting of facilities and deployment of service will be with Siyeh with the cooperative assistance of RTC.

6. It is the intention of the BTBC that this document constitutes a Certification sufficient to satisfy the requirements of 47 C.F.R. §1.2110(e)(3) ("bidding credit for serving qualifying tribal land"), and qualifies Ronan Telephone Company to receive the full benefit of the Tribal land bidding credit as allowed by FCC rules.

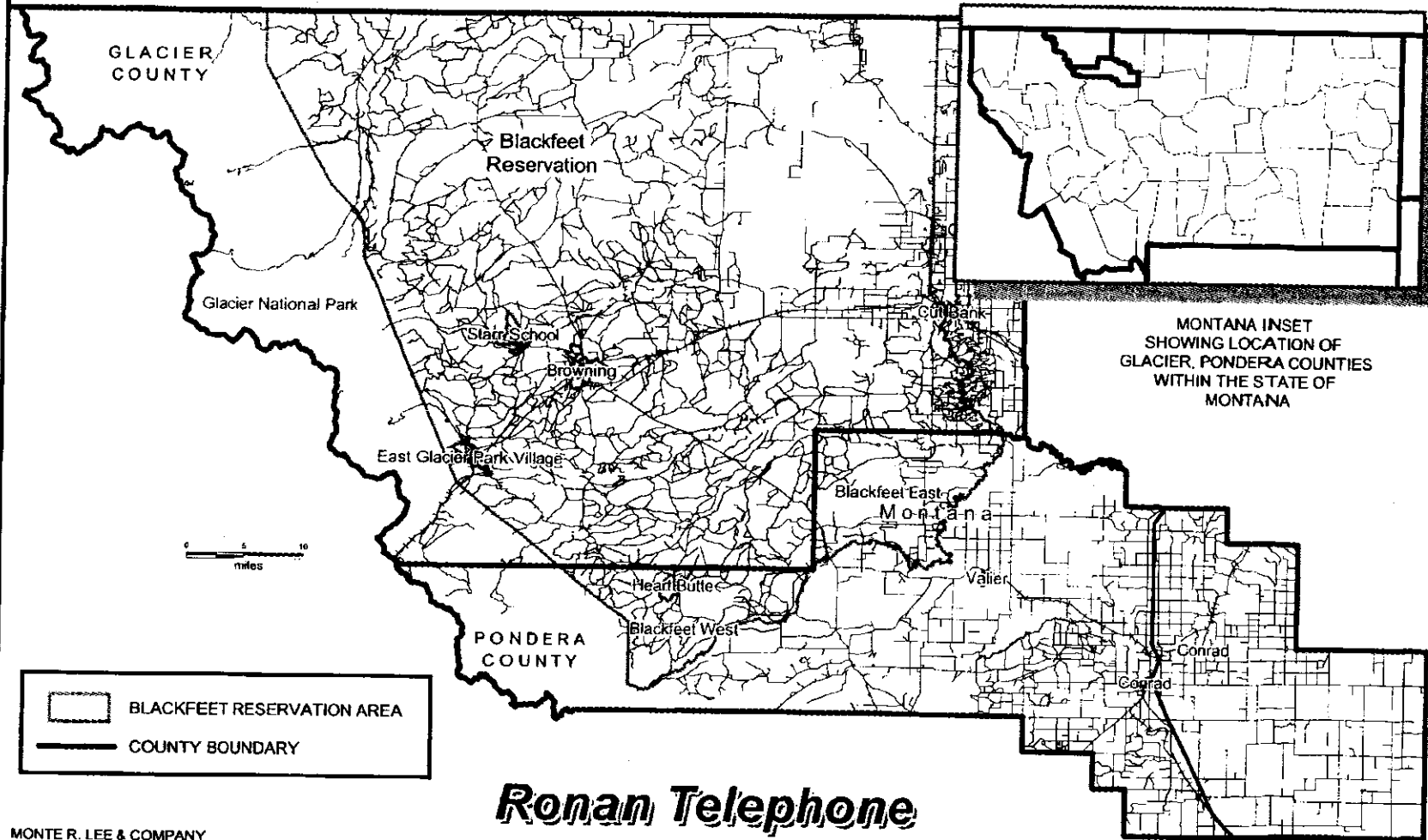
THE BLACKFEET TRIBAL BUSINESS COUNCIL

By: William (Allen) Talks About
William (Allen) Talks About, Chairman

DATED: December 16, 2002

¹ FCC website, See reference to the Blackfeet Reservation, FCC website, "List of Tribal Lands with Telephone Penetration Rate" at <http://wireless.fcc.gov/auctions/data/crossreferences/att_1_ver.pdf> (line 53).

Blackfeet Reservation Area Glacier & Pondera Counties, Montana



MONTANA INSET
SHOWING LOCATION OF
GLACIER, PONDERA COUNTIES
WITHIN THE STATE OF
MONTANA

Ronan Telephone

MONTE R. LEE & COMPANY
CONSULTING ENGINEERS
OKLAHOMA CITY, OK 73116

EXHIBIT D